

United States District Court
for the
Southern District of Texas

UNITED STATES OF AMERICA)
V.)
Joshua Romeo GARZA) Case Number:
Laredo, TX)
)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 4, 2018 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 8 United States Code, Section
1324

Offense Description
Did unlawfully transport and move, and conspired to transport and move, Mexican nationals Miguel Ismael JUAREZ-Juarez and Victor Alfonso LOPEZ-Reyes by means of a motor vehicle or otherwise within the Southern District of Texas, knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and transported and moved said aliens in furtherance of such violation of law.

This criminal complaint is based on these facts:

See attachment "A".



Continued on the attached sheet.

/s/ Adam R. Rodriguez
Complainant's Signature

Adam R. Rodriguez, Special Agent
Printed Name and Title

Sworn to before me and signed in my presence,

Date: April 9, 2018

Judge's Signature

City and State: Laredo, Texas

Nancy K. Johnson, U.S. Magistrate Judge
Printed Name and Title

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[CONT OF BASIS OF COMPLAINT]

On April 4, 2018, Border Patrol Agents (BPAs) were working operations as part of the Laredo South Station (LRS) Field Intelligence Team (FIT). At approximately 10:00 P.M. the LRS camera operator informed agents working the Chacon Creek area that a group of approximately seven individuals were attempting to cross the Rio Grande River. BPAs in an unmarked Border Patrol Unit made their way towards Benavides Park and strategically positioned their unit near the park to observe any illicit activity.

At approximately 10:30 P.M., the BPAs were notified via the service radio that the seven subjects were making their way along the walking trail, under the Meadow Street Bridge heading towards Benavides Park. At that time, the Department of Public Safety (DPS) along with Laredo Police Department (LPD) were informed of the traffic by an agent assigned to the Laredo Sector Operations Center (LSOC). As the BPAs were stationary observing the park, they observed a black in color Nissan Sentra slowly making its way into the park, do a lap around the park and then it parked into a parking spot. Shortly thereafter, the BPAs witnessed two subjects emerge from the walking trail and get into the black Nissan Sentra. The information was immediately put out via service radios and relayed to both DPS and LPD for someone to interdict the vehicle as it was leaving the parking lot of the park.

As the Nissan Sentra made its way out of the park, a marked DPS trooper was standing by at the corner of Bartlett Avenue and Blaine Street. The Nissan Sentra and the DPS unit made their way to the corner of Ross Street and US Highway (HWY) 83 where the DPS trooper attempted to perform a vehicle stop. At that time, the vehicle failed to yield to the DPS trooper and sped off eastbound on Jaime Zapata Memorial Highway. Shortly after the vehicle crashed into another vehicle. The driver of the Nissan Sentra (later identified as Joshua Romeo GARZA) attempted to abscond from the vehicle and was apprehended. BPAs determined that the two (2) individuals who got into the black Nissan Sentra were illegally present in the United States.

The two undocumented aliens (UDAs), GARZA and the driver of the oncoming vehicle were transported to the hospital to have their injuries treated. BPAs then contacted Homeland Security Investigation (HSI) special agents (SA) for investigative assistance with the case.

GARZA was advised of his Miranda Warnings, to which he waived and agreed to talk to HSI SAs without a lawyer present. GARZA stated he agreed to transport the individuals and would be paid one hundred fifty dollars (\$150) for every UDA he transported. GARZA stated he made all the arrangements with a family member in Mexico.

SAs interviewed material witness Miguel Ismael JUAREZ-Juarez. JUAREZ stated he illegally entered the United States by swimming across the river into the United States. JUAREZ stated he paid two thousand dollars (\$2,000) to be smuggled to Laredo, Texas. GARZA stated he was instructed by GARZA to get into the Nissan Sentra when he approached him at the park.

SAs were unable to interview Victor Alfonso LOPEZ-Reyes because he was airlifted to a San Antonio hospital due to the severity of his injuries.